

JGW2013R00768

FILED
U.S. DISTRICT COURT
DISTRICT OF MARYLAND

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

CLERK'S OFFICE
AT BALTIMORE

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|--------------------------|--------|-------------------------------------|
| UNITED STATES OF AMERICA | DEPUTY | CRIMINAL NO. WDC-14-0109 |
| v. | : | (Conspiracy to Interfere with |
| BRANDON FERRELL | : | Commerce by Robbery, 18 U.S.C. § |
| STEPHANIE AMBER SMITH, | : | 1951(a); Interference with |
| Defendants. | : | Commerce by Robbery, 18 U.S.C. § |
| | : | 1951(a); Possession of a Firearm in |
| | : | Furtherance of a Crime of Violence, |
| | : | 18 U.S.C. § 924(c); Possession of a |
| | : | Firearm by a Convicted Felon, 18 |
| | : | U.S.C. § 922(g)(1); Aiding and |
| | : | Abetting, 18 U.S.C. § 2) |

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INDICTMENT

COUNT ONE

The Grand Jury for the District of Maryland charges that:

1. At all times material to this Indictment, 7-Eleven was a corporation having business offices in multiple states and was engaged in retail sales of consumer products obtained from vendors within and outside the state of Maryland, and as such are businesses which affect interstate commerce.

2. At all times material to this Indictment, the Shell Oil Company is a corporation having business offices in multiple states and was engaged the retail sales of gasoline, petroleum products, and consumer goods obtained from vendors within and outside the state of Maryland, and as such is a business which affects interstate commerce.

3. Between on or about September 27, 2013 and continuing through October 1,

2013, in the District of Maryland, the defendants,

**BRANDON FERRELL
STEPHANIE AMBER SMITH,**

did knowingly and willfully combine, conspire, confederate and agree with each other and with others known and unknown to the Grand Jury to obstruct, delay and affect, commerce as that term is defined in 18 U.S.C. § 1951, and the movement of articles and commodities in such commerce, by robbery as that term is defined in 18 U.S.C. § 1951.

Ways, Manner and Means of the Conspiracy

4. It was part of the conspiracy that BRANDON FERRELL and STEPHANIE AMBER SMITH robbed, at gunpoint, commercial businesses of United States currency.

Overt Acts

5. In furtherance of the conspiracy, and to effect the objects thereof, the defendants performed, participated in and did the following acts in the District of Maryland, among others:

a. On or about September 27, 2013, at approximately 3:35 a.m. BRANDON FERRELL and STEPHANIE AMBER SMITH did forcibly steal, at gunpoint, from an employee of the 7-Eleven located at 3500 Boston Street, Baltimore City, approximately \$160.00 in United States currency which was lawfully in the possession of said employee.

b. On or about September 29, 2013, at approximately 1:00 a.m. BRANDON FERRELL and STEPHANIE AMBER SMITH did forcibly steal, at gunpoint, from an employee of the Shell Gasoline Station located at 1517 South Caton Avenue, Baltimore City, approximately \$208.00 in United States currency which was lawfully in the possession of said employee.

c. On or about September 29, 2013, at approximately 4:25 a.m. BRANDON

FERRELL and STEPHANIE AMBER SMITH did forcibly steal, at gunpoint, from an employee of the 7-Eleven located at 4535 Falls Road, Baltimore City, approximately \$90.00 in United States currency which was lawfully in the possession of said employee.

d. On or about September 29, 2013, at approximately 5:13 a.m., BRANDON FERRELL and STEPHANIE AMBER SMITH did forcibly steal, at gunpoint, from employees of the 7-Eleven located at 8507 Loch Raven Boulevard, Baltimore County, approximately \$180.00 in United States currency which was lawfully in the possession of said employees.

18 U.S.C. § 1951.

COUNT TWO

1. The allegations of Paragraphs 1 and 2 of Count One are incorporated here.
2. On or about September 27, 2013, in the District of Maryland,

**BRANDON FERRELL
STEPHANIE AMBER SMITH,**

the defendants herein, did knowingly and intentionally obstruct, delay and affect, and attempt to obstruct, delay and affect, commerce as that term is defined in Title 18, United States Code § 1951, and the movement of articles and commodities in such commerce, by robbery as that term is defined in Title 18, United States Code, § 1951, in that the defendants **BRANDON FERRELL** and **STEPHANIE AMBER SMITH**, did unlawfully take personal property consisting of United States currency in the amount of \$160.00, more or less, from the person of an employee of the 7-Eleven located at 3500 Boston Street, Baltimore, Maryland, against his will, by means of actual and threatened force, violence, and fear of injury to his person and by threatening serious physical injury and death to said employee by means of a firearm and deadly weapon.

18 U.S.C. § 1951
18 U.S.C. § 2

COUNT THREE

The Grand Jury for the District of Maryland further charges that:

On or about September 27, 2013, in the District of Maryland,

**BRANDON FERRELL
STEPHANIE AMBER SMITH,**

the defendants herein, did knowingly use, carry and brandish a firearm during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, that is, conspiracy to interfere with commerce by robbery, and interference with commerce by robbery, as more fully set forth in Counts One and Two of this Indictment.

18 U.S.C. § 924(c)(1)(A)(i) and (ii)
18 U.S.C. § 2

COUNT FOUR

1. The allegations of Paragraphs 1 and 2 of Count One are incorporated here.
2. On or about September 29, 2013, in the District of Maryland,

**BRANDON FERRELL
STEPHANIE AMBER SMITH,**

the defendants herein, did knowingly and intentionally obstruct, delay and affect, and attempt to obstruct, delay and affect, commerce as that term is defined in Title 18, United States Code § 1951, and the movement of articles and commodities in such commerce, by robbery as that term is defined in Title 18, United States Code, § 1951, in that the defendants BRANDON FERRELL and STEPHANIE AMBER SMITH did unlawfully take personal property consisting of United States currency in the amount of \$208.00, more or less, from the person of an employee of the Shell Gasoline Station located at 1517 South Caton Avenue, Baltimore, Maryland, against his will, by means of actual and threatened force, violence, and fear of injury to his person and by threatening serious physical injury and death to said employee by means of a firearm and deadly weapon.

18 U.S.C. § 1951

18 U.S.C. § 2

COUNT FIVE

The Grand Jury for the District of Maryland further charges that:

On or about September 29, 2013, in the District of Maryland,

**BRANDON FERRELL
STEPHANIE AMBER SMITH**

the defendants herein, did use, carry and brandish a firearm during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, that is, conspiracy to interfere with commerce by robbery, and interference with commerce by robbery, as more fully set forth in Counts One and Four of this Indictment.

18 U.S.C. § 924(c)(1)(A)(i) and (ii)
18 U.S.C. § 2

COUNT SIX

1. The allegations of Paragraphs 1 and 2 of Count One are incorporated here.
2. On or about September 29, 2013, in the District of Maryland,

**BRANDON FERRELL
STEPHANIE AMBER SMITH,**

the defendants herein, did knowingly and intentionally obstruct, delay and affect, and attempt to obstruct, delay and affect, commerce as that term is defined in Title 18, United States Code § 1951, and the movement of articles and commodities in such commerce, by robbery as that term is defined in Title 18, United States Code, § 1951, in that the defendants **BRANDON FERRELL** and **STEPHANIE AMBER SMITH** did unlawfully take personal property consisting of United States currency in the amount of \$90.00, more or less, from the person of an employee of the 7-Eleven located at 4535 Falls, Road, Baltimore, Maryland, against his will, by means of actual and threatened force, violence, and fear of injury to his person and by threatening serious physical injury and death to said employee by means of a firearm and deadly weapon.

18 U.S.C. § 1951
18 U.S.C. § 2

COUNT SEVEN

The Grand Jury for the District of Maryland further charges that:

On or about September 29, 2013, in the District of Maryland,

**BRANDON FERRELL
STEPHANIE AMBER SMITH,**

the defendants herein, did use, carry and brandish a firearm during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, that is, conspiracy to interfere with commerce by robbery, and interference with commerce by robbery, as more fully set forth in Counts One and Six of this Indictment.

18 U.S.C. § 924(c)(1)(A)(i) and (ii)

18 U.S.C. § 2

COUNT EIGHT

1. The allegations of Paragraph 1 of Count One are incorporated here
2. On or about September 29, 2013, in the District of Maryland,

**BRANDON FERRELL
STEPHANIE AMBER SMITH,**

the defendants herein, did knowingly and intentionally obstruct, delay and affect, and attempt to obstruct, delay and affect, commerce as that term is defined in Title 18, United States Code § 1951, and the movement of articles and commodities in such commerce, by robbery as that term is defined in Title 18, United States Code, § 1951, in that the defendants **BRANDON FERRELL** and **STEPHANIE AMBER SMITH**, did unlawfully take personal property consisting of United States currency in the amount of \$180.00, more or less, from the person of an employee of the 7- Eleven located at 8507 Loch Raven Boulevard, Baltimore, Maryland, against his will, by means of actual and threatened force, violence, and fear of injury to his person and by threatening serious physical injury and death to said employee by means of a firearm and deadly weapon.

18 U.S.C. § 1951
18 U.S.C. § 2

COUNT NINE

The Grand Jury for the District of Maryland further charges that:

On or about September 29, 2013, in the District of Maryland,

**BRANDON FERRELL
STEPHANIE AMBER SMITH,**

the defendants herein, did use, carry and brandish a firearm during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, that is, conspiracy to interfere with commerce by robbery, and interference with commerce by robbery, as more fully set forth in Counts One and Eight of this Indictment.

18 U.S.C. § 924(c)(1)(A)(i) and (ii)
18 U.S.C. § 2

COUNT TEN

The Grand Jury for the District of Maryland further charges that:

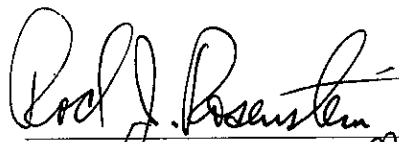
On or about October 8, 2013, in the District of Maryland,


BRANDON FERRELL

the defendant herein, having been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly and unlawfully possess a .45 caliber Norinco semi-automatic pistol with an obliterated serial number, in and affecting commerce.

18 U.S.C. § 922(g)(1)

18 U.S.C. § 2



ROD J. ROSENSTEIN
United States Attorney 

A TRUE BILL:

SIGNATURE REDACTED

For person

Date:

3/6/14